

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

DAVID KELLY, )  
Plaintiff, )  
v. )  
TARGET CORPORATION, )  
dba Target and/or Target Stores, Inc. )  
Defendant. )

# **DEFENDANT TARGET CORPORATION'S CORPORATE DISCLOSURE STATEMENT**

Defendant Target Corporation, by and through its undersigned counsel, and in compliance with the provisions of Rule 7.1 of the Federal Rules of Civil Procedure, hereby discloses that it has no parent corporation and that no publicly-held corporation owns 10% or more of its stock.

Dated: November 13, 2018

Respectfully Submitted,

## **Target Corporation dba Target and/or Target Stores, Inc.**

By /s/ Elizabeth M. Ebanks  
Elizabeth M. Ebanks, Esquire  
Virginia State Bar Number 72111  
[elizabeth.ebanks@ogletreedeakins.com](mailto:elizabeth.ebanks@ogletreedeakins.com)  
Scott A. Siegner, Esquire  
Virginia State Bar Number 89570  
[scott.siegner@ogletreedeakins.com](mailto:scott.siegner@ogletreedeakins.com)  
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
901 East Byrd Street, Suite 1300  
Riverfront Plaza, West Tower  
Richmond, VA 23219  
Tel.: (804) 663-2330  
Fax: (855) 843-1809

*Counsel for Defendant*

### **Certificate of Service**

I hereby certify that on this 13th day of November 2018, I electronically filed the foregoing with the clerk of the court using the CM/ECF system, which will send notification of such filing to counsel for Plaintiff:

Donna L. Biderman, Esquire  
Virginia State Bar No.: 40818  
Law Office of Donna L. Biderman, PLLC  
4015 Chain Bridge Road  
Suite 32  
Fairfax, Virginia 22030  
Voice: (703) 966-5434  
Fax: (888) 450-8569  
[dbiderman@bidermanlaw.com](mailto:dbiderman@bidermanlaw.com)

*Counsel for Plaintiff*

By /s/ Elizabeth M. Ebanks  
Elizabeth M. Ebanks, Esquire  
Virginia State Bar Number 72111  
[elizabeth.ebanks@ogletreedeakins.com](mailto:elizabeth.ebanks@ogletreedeakins.com)  
Scott A. Siegner, Esquire  
Virginia State Bar Number 89570  
[scott.siegner@ogletreedeakins.com](mailto:scott.siegner@ogletreedeakins.com)  
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
901 East Byrd Street, Suite 1300  
Riverfront Plaza, West Tower  
Richmond, VA 23219  
Tel.: (804) 663-2330  
Fax: (855) 843-1809

*Counsel for Target*